

The Honorable David G. Estudillo

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION

WILL CO. LTD. a limited liability company
organized under the laws of Japan,

Plaintiff,

vs.

KAM KEUNG FUNG, aka 馮錦強, aka
FUNG KAM KEUNG, aka FUNG KAM-
KEUNG, aka KUENG FUNG, aka KEUNG
KAM FUNG, aka KAM-KEUNG FUNG, aka
KEVIN FUNG, an individual; FELLOW
SHINE GROUP LIMITED, a foreign company,
and DOES 1-20, d/b/a AVGLE.COM,

Defendants.

Case No.: 3:20-cv-05666-DGE

**DECLARATION OF SPENCER
FREEMAN IN SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL
DISCOVERY AGAINST DEFENDANT
FELLOW SHINE GROUP LIMITED**

NOTE ON MOTION CALENDAR:
December 10, 2021

I, Spencer Freeman, under penalty of perjury, declare and state as follows:

1. I am an attorney at law licensed to practice before the Courts of the State of Washington, the United States District Court Western District of Washington, Eastern District of Washington, Ninth Circuit Court of Appeals, and United States Supreme Court. I am the principal attorney with Freeman Law Firm, Inc., attorneys for Plaintiff Will Co. Ltd. Unless otherwise stated, I have personal knowledge of the facts contained herein this declaration and, if called and sworn as a witness, could and would competently testify thereto.

DECLARATION OF SPENCER FREEMAN IN
SUPPORT OF PLAINTIFFS' MOTION TO COMPEL
DISCOVERY - 1
[NO. 3:21-cv-05666 DGE]

FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98042
(253) 383-4500 - (253) 383-4501 (fax)

1 2. On August 11, 2021, I served Defendant Fellow Shine Group's counsel with
2 discovery requests.

3 3. On September 14, 2021, Defendant Fellow Shine Group's served Plaintiff with
4 responses to discovery requests.

5 4. Attached hereto as Exhibit A is true and correct copy of the requests and
6 responses.

7 5. On September 24, 2021, I emailed Defendant's counsel to set a Fed.R.Civ.P. 37
8 conference regarding deficiencies in the discovery responses, expressly stating that the
9 limitation to companies located in the United States was deficient.

10 6. On September 30, 2021, I conferred with Fung counsel via telephone regarding
11 the discovery requests and Plaintiff's asserted deficiencies. Defendant Fellow Shine Group
12 took the position that no further production would be forthcoming and it was agreed that the
13 issues would need to be resolved by a motion to compel.

14 7. During the September 30, 2021 telephone conference, two issues arose requiring
15 clarification from Defendant Fellow Shine Group, whether there were any written contract with
16 ad brokers other than Tiger Media and whether, when Fellow Shine Group stated there were "no
17 documents with United States entities," he also meant that there were no documents which
18 referenced the United States. Regarding the latter issue, Defendant Fellow Shine Group made
19 the full comment/explanation in some places while limiting the explanation to "with United
20 States entities" in others.

21 8. On October 29, 2021, Defendant Fellow Shine Group provided the requested
22 clarification: there were no written contracts with advertising brokers and wherever Fellow
23 Shine Group stated that there were "no documents with United States entities" there were also
24 no related documents that reference the United States.

25 I declare under the penalty of perjury under the laws of the State of Washing and the
26 United States that the foregoing is true and correct.

DECLARATION OF SPENCER FREEMAN IN
SUPPORT OF PLAINTIFFS' MOTION TO COMPEL
DISCOVERY - 2
[NO. 3:21-cv-05666 DGE]

FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98042
(253) 383-4500 - (253) 383-4501 (fax)

1 Executed on the 28th day of November 2021 at Tacoma, Washington.
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4 /s/ Spencer D. Freeman
5 Spencer Freeman
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The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION**

WILL CO. LTD. a limited liability company
organized under the laws of Japan,
Plaintiff,

vs.

KAM KEUNG FUNG, aka 馮錦強, aka
FUNG KAM KEUNG, aka FUNG
KAMKEUNG, aka KUENG FUNG, aka
KEUNG KAM FUNG, aka KAM-KEUNG
FUNG, aka KEVIN FUNG, an individual;
FELLOW SHINE GROUP LIMITED, a
foreign company, and DOES 1-20, d/b/a
AVGLE.COM,

Case No. 3:20-cv-05666-RSL

**DEFENDANT FELLOW SHINE GROUP
LIMITED'S RESPONSES TO
PLAINTIFF'S FIRST
INTERROGATORIES AND REQUESTS
FOR PRODUCTION**

**DEFENDANT FELLOW SHINE GROUP LIMITED'S RESPONSES TO PLAINTIFF'S
FIRST INTERROGATOIRES AND REQUESTS FOR PRODUCTION**

Defendant Fellow Shine Group Limited ("FSG" or "Defendant") hereby responds to
Plaintiff's first Interrogatories and Requests for Production as follows:

INITIAL OBJECTIONS: FSG objects to the extent that any of Plaintiff's Requests or
Interrogatories seek information or documents protected by any privilege, including, without
limitation, the attorney-client privilege or the attorney work product doctrine or any other
privilege or confidentiality. To the extent that any documents which are subject to such

1 privileges are produced, FSG does not waive any applicable privilege exceeding the document(s)
2 that were produced. FSG objects on the basis that many of these requests are unlimited in time,
3 seek irrelevant information and/or information not reasonably calculated to lead to the discovery
4 of admissible evidence. FSG objects to these requests to the extent that they seek documents or
5 information wholly unrelated to the issue of personal jurisdiction as the Court has only allowed
6 jurisdictional discovery to proceed.

7 **REQUEST NO. 1:** Produce all articles of incorporation, operating agreements, and/or any
8 document which relates to the creation of Fellow Shine Group, Ltd. and the business of Fellow
9 Shine Group, Ltd.

10 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad and unduly
11 burdensome and seeks irrelevant information and/or information not reasonably calculated to
12 lead to the discovery of admissible evidence. Defendant objects to the extent that this request is
13 vague and ambiguous. Subject to and without waiving these objections, Defendant responds as
14 follows:

15 **RESPONSE:** Defendant produces the Memorandum of Association and the Articles of
16 Association of Fellow Shine Group Limited. These are produced in documents bates stamped:
17 FSG 000001 – FSG 000019.

18 **REQUEST NO. 2:** Produce any and all Fellow Shine Group, Ltd. financial documents, from
19 January 1, 2018 to the present, including bank account statements, e-wallet account statements
20 (such as Paypal or Paxum), and any cryptocurrency accounts.

21 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad and unduly
22 burdensome and seeks irrelevant information and/or information not reasonably calculated to
23 lead to the discovery of admissible evidence. Defendant objects to this request to the extent that
24 is seeks information or documents that are protected from discovery or disclosure by virtue of

1 the right to privacy, constitute confidential information, proprietary information, or trade secrets,
2 or which are otherwise protected from discovery.

3 **RESPONSE:** Defendant has no responsive documents within its care, custody, or control
4 relating to or evidencing financial transaction with United States entities or persons, or which
5 relate to services or transactions relating to the United States, for the period of January 1, 2019
6 through June 2020.

7 **REQUEST NO. 3:** Produce any and all contracts Fellow Shine Group, Ltd. has with any
8 hosting companies, including but not limited to Cloudflare, Inc.

9 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad and unduly
10 burdensome and seeks irrelevant information and/or information not reasonably calculated to
11 lead to the discovery of admissible evidence. Subject to and without waiving these objections,
12 Defendant responds as follows:

13 **RESPONSE:** Defendant will produce responsive documents within its care, custody, or control
14 with respect to any contracts active during the period of January 2019 – June 2020 with
15 companies located in the United States or providing hosting to Avgle.com within the United
16 States. Defendant's relationship with Cloudflare, Inc. is governed by Cloudflare, Inc's terms of
17 service, outlined on its website and produced as documents bates stamped: FSG 000020 – FSG
18 000026.

19 **REQUEST NO. 4:** Produce any and all invoices from any hosting companies to Fellow Shine
20 Group, Ltd. and/or regarding services for Avgle.com, including, but not limited to Cloudflare,
21 Inc.

22 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad, unbound
23 by scope, and unduly burdensome and seeks irrelevant information and/or information not
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1 reasonably calculated to lead to the discovery of admissible evidence. Subject to and without
2 waiving these objections, Defendant responds as follows:

3 **RESPONSE:** Defendant has no responsive documents within its care, custody, or
4 control from the time period of January 2019 through June 2020 involving companies located
5 within the United States or providing hosting to Avgle.com within the United States.

6 **REQUEST NO. 5:** Produce records of any and all payments you made to any hosting
7 companies regarding services for Fellow Shine Group, Ltd. and/or Avgle.com, including but not
8 limited to Cloudflare, Inc.

9 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad, unbound
10 by scope, and unduly burdensome and seeks irrelevant information and/or information not
11 reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this
12 request to the extent that it seeks information or documents that are protected from discovery or
13 disclosure by virtue of the right to privacy, constitute confidential information, proprietary
14 information, or trade secrets, or which are otherwise protected from discovery. Subject to and
15 without waiving these objections, Defendant responds as follows:

16 **RESPONSE:** Defendant has no responsive documents within its care, custody, or
17 control from the time period of January 2019 through June 2020 involving companies located
18 within the United States or providing hosting to Avgle.com within the United States.

19 **REQUEST NO. 6:** Produce copies of any and all communications you had with any hosting
20 companies regarding services for Fellow Shine Group, Ltd. and/or Avgle.com, including but not
21 limited to Cloudflare, Inc.

22 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad, unbound
23 by scope, and unduly burdensome and seeks irrelevant information and/or information not
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1 reasonably calculated to lead to the discovery of admissible evidence. Subject to and without
2 waiving these objections, Defendant responds as follows:

3 **RESPONSE:** Defendant will produce responsive documents within its care, custody, or
4 control from the time period of January 2019 through June 2020. These documents are produced
5 as documents bates stamped: FSG 000027 – 000034.

6 **REQUEST NO. 7:** Produce any and all contracts Fellow Shine Group, Ltd. has with any
7 online payment processors, including but not limited to Paypal, Inc.

8 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad, unbound
9 by scope, and unduly burdensome and seeks irrelevant information and/or information not
10 reasonably calculated to lead to the discovery of admissible evidence. Subject to and without
11 waiving these objections, Defendant responds as follows:

12 **RESPONSE:** Defendant has no responsive documents within its possession, custody, or
13 control with respect to United States online payment processors, such as Paypal, Inc., for the
14 time period of January 2019 through June 2020.

15 **REQUEST NO. 8:** Produce any and all invoices from any online payment processor sent to
16 Fellow Shine Group, Ltd. and/or regarding services for Avgle.com, including but not limited to
17 Paypal, Inc.

18 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad, unbound
19 by scope, and unduly burdensome and seeks irrelevant information and/or information not
20 reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this
21 request to the extent that it seeks information or documents that are protected from discovery or
22 disclosure by virtue of the right to privacy, constitute confidential information, proprietary
23 information, or trade secrets, or which are otherwise protected from discovery. Subject to and
24 without waiving these objections, Defendant responds as follows:

1 **RESPONSE:** Defendant has no responsive documents within its possession, custody, or
2 control, with respect to invoices from United States online payment processors, such as Paypal,
3 Inc. for the time period of January 2019 through June 2020.

4 **REQUEST NO. 9:** Produce records of any and all payments to any online payment processor
5 regarding services for Fellow Shine Group, Ltd. and/or Avgle.com, including but not limited to
6 Paypal, Inc.

7 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad, unbound by
8 scope, and unduly burdensome and seeks irrelevant information and/or information not
9 reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this
10 request to the extent that it seeks information or documents that are protected from discovery or
11 disclosure by virtue of the right to privacy, constitute confidential information, proprietary
12 information, or trade secrets, or which are otherwise protected from discovery. Subject to and
13 without waiving these objections, Defendant responds as follows:

14 **RESPONSE:** Defendant has no responsive documents within its possession, custody, or
15 control, with respect to payments to United States online payment processors, such as Paypal,
16 Inc. for the time period of January 2019 through June 2020.

17 **REQUEST NO. 10:** Produce copies of any and all communications with any online payment
18 processing company regarding services for Fellow Shine Group, Ltd. and/or Avgle.com,
19 including but not limited to Paypal, Inc.

20 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad, unbound by
21 scope, and unduly burdensome and seeks irrelevant information and/or information not
22 reasonably calculated to lead to the discovery of admissible evidence. Subject to and without
23 waiving these objections, Defendant responds as follows:
24

1 **RESPONSE:** Defendant has no responsive documents within its possession, custody, or control,
2 with respect to communications with United States online payment processors, such as Paypal,
3 Inc. for the time period of January 2019 through June 2020.

4 **REQUEST NO. 11:** Produce any and all contracts Fellow Shine Group, Ltd. has with any
5 advertiser brokers or any company that has authority to contract for the placement of
6 advertisements on Avgle.com, including but not limited to Tiger Media.

7 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad, unbound by
8 scope, and unduly burdensome and seeks irrelevant information and/or information not
9 reasonably calculated to lead to the discovery of admissible evidence. Subject to and without
10 waiving these objections, Defendant responds as follows:

11 **RESPONSE:** Defendant will produce its contract with Tiger Media Inc. d/b/a JuicyAds,
12 a Canadian corporation. This contract is produced with documents bates stamped: FSG 000035
13 – 000040.

14 **REQUEST NO. 12:** Produce any and all invoices from any advertiser brokers or any company
15 that has authority to contract for the placement of advertisements on Avgle.com to Fellow Shine
16 Group, Ltd. and/or regarding services for Avgle.com, including but not limited to Tiger Media.

17 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad, unbound by
18 scope, and unduly burdensome and seeks irrelevant information and/or information not
19 reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this
20 request to the extent that it seeks information or documents that are protected from discovery or
21 disclosure by virtue of the right to privacy, constitute confidential information, proprietary
22 information, or trade secrets, or which are otherwise protected from discovery. Subject to and
23 without waiving these objections, Defendant responds as follows:
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1 **RESPONSE:** Defendant has no responsive documents within its care, custody, or
2 control, with respect to invoices from United States advertising brokers for the time period of
3 January 2019 through June 2020.

4 **REQUEST NO. 13:** Produce records of any and all payments to any advertiser brokers or any
5 company that has authority to contract for the placement of advertisements on Avgle.com
6 regarding services for Fellow Shine Group, Ltd., and/or Avgle.com, including but not limited to
7 Tiger Media.

8 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad, unbound by
9 scope, and unduly burdensome and seeks irrelevant information and/or information not
10 reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this
11 request to the extent that it seeks information or documents that are protected from discovery or
12 disclosure by virtue of the right to privacy, constitute confidential information, proprietary
13 information, or trade secrets, or which are otherwise protected from discovery. Subject to and
14 without waiving these objections, Defendant responds as follows:

15 **RESPONSE:** Defendant has no responsive documents within its care, custody, or
16 control, with respect to payments made to United States advertising brokers for the time period
17 of January 2019 through June 2020.

18 **REQUEST NO. 14:** Produce copies of any and all communications with any advertiser brokers
19 or any company that has authority to contract for the placement of advertisements on Avgle.com
20 regarding services for Fellow Shine Group, Ltd., and/or Avgle.com, including but not limited to
21 Tiger Media.

22 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad, unbound by
23 scope, and unduly burdensome and seeks irrelevant information and/or information not
24 reasonably calculated to lead to the discovery of admissible evidence.

1 **RESPONSE:** Defendant has no responsive documents within its care, custody, or
2 control, with respect to communications with United States advertising brokers for the time
3 period of January 2019 through June 2020.

4 **REQUEST NO. 15:** Produce any and all contracts Fellow Shine Group, Ltd. has with any
5 companies regarding advertisements or potential advertisements on Avgle.com, including but
6 not limited to Multi Media LLC and DoubleClick, Inc.

7 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad, unbound by
8 scope, and unduly burdensome and seeks irrelevant information and/or information not
9 reasonably calculated to lead to the discovery of admissible evidence.

10 **RESPONSE:** Defendant has no responsive documents within its care, custody, or
11 control, with respect to United States advertising companies for the time period of January 2019
12 through June 2020.

13 **REQUEST NO. 16:** Produce any and all invoices from any companies to Fellow Shine Group,
14 Ltd. relating to any advertising on Avgle.com including but not limited to Multi Media LLC and
15 DoubleClick, Inc.

16 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad, unbound by
17 scope, and unduly burdensome and seeks irrelevant information and/or information not
18 reasonably calculated to lead to the discovery of admissible evidence.

19 **RESPONSE:** Defendant has no responsive documents within its care, custody, or
20 control, with respect to invoices from United States advertising companies for the time period of
21 January 2019 through June 2020.

22 **REQUEST NO. 17:** Produce records of any and all payments to any company regarding
23 advertising on Avgle.com, including but not limited to Multi Media LLC and DoubleClick, Inc.
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OBJECTION: Defendant objects to this Request to the extent it is overbroad, unbound by scope, and unduly burdensome and seeks irrelevant information and/or information not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to this request to the extent that it seeks information or documents that are protected from discovery or disclosure by virtue of the right to privacy, constitute confidential information, proprietary information, or trade secrets, or which are otherwise protected from discovery. Subject to and without waiving these objections, Defendant responds as follows:

RESPONSE: Defendant has no responsive documents within its care, custody, or control, with respect to payments made to United States advertising companies for the time period of January 2019 through June 2020.

REQUEST NO. 18: Produce copies of any and all communications with any company advertising on Avgle.com including but not limited to Multi Media LLC and DoubleClick, Inc.

OBJECTION: Defendant objects to this Request to the extent it is overbroad, unbound by scope, and unduly burdensome and seeks irrelevant information and/or information not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects on the basis that this request is ambiguous. Subject to and without waiving these objections, Defendant responds as follows:

RESPONSE: Defendant has no responsive documents within its care, custody, or control, with respect to communications with United States advertising companies for the time period of January 2019 through June 2020.

REQUEST NO. 19: Produce copies of any and all communications with any company regarding advertising on Avgle.com including but not limited to Multi Media LLC and DoubleClick, Inc.

1 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad, unbound by
2 scope, and unduly burdensome and seeks irrelevant information and/or information not
3 reasonably calculated to lead to the discovery of admissible evidence. Subject to and without
4 waiving these objections, Defendant responds as follows:

5 **RESPONSE:** Defendant has no responsive documents within its possession, custody, or
6 control, with respect to communications with United States companies regarding advertising for
7 the time period of January 2019 through June 2020.

8 **REQUEST NO. 20:** Produce any and all contracts Fellow Shine Group, Ltd. has with Awesapp
9 Ltd.

10 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad and unduly
11 burdensome and seeks irrelevant information and/or information not reasonably calculated to
12 lead to the discovery of admissible evidence. Subject to and without waiving these objections,
13 Defendant responds as follows:

14 **RESPONSE:** Defendant has no such documents that specifically reference or concern
15 the United States in its care, custody, or control.

16 **REQUEST NO. 21:** Produce any and all invoices from Awesapp Ltd.

17 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad and unduly
18 burdensome and seeks irrelevant information and/or information not reasonably calculated to
19 lead to the discovery of admissible evidence. Defendant objects to this request to the extent that
20 is seeks information or documents that are protected from discovery or disclosure by virtue of
21 the right to privacy, constitute confidential information, proprietary information, or trade secrets,
22 or which are otherwise protected from discovery.

23 Subject to and without waiving these objections, Defendant responds as follows:
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1 **RESPONSE:** Defendant has no such documents that specifically reference or concern
2 the United States in its care, custody, or control.

3 **REQUEST NO. 22:** Produce records of any and all payments to Awesapp Ltd.

4 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad and unduly
5 burdensome and seeks irrelevant information and/or information not reasonably calculated to
6 lead to the discovery of admissible evidence. Defendant objects to this request to the extent that
7 it seeks information or documents that are protected from discovery or disclosure by virtue of
8 the right to privacy, constitute confidential information, proprietary information, or trade secrets,
9 or which are otherwise protected from discovery.

10 Subject to and without waiving these objections, Defendant responds as follows:

11 **RESPONSE:** Defendant has no such documents that specifically reference or concern
12 the United States in its care, custody, or control.

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14 **REQUEST NO. 23:** Produce copies of any and all communications with Awesapp Ltd.

15 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad and unduly
16 burdensome and seeks irrelevant information and/or information not reasonably calculated to
17 lead to the discovery of admissible evidence. Subject to and without waiving these objections,
18 Defendant responds as follows:

19 **RESPONSE:** Defendant has no such documents that specifically reference or concern
20 the United States in its care, custody, or control.

21
22 **REQUEST NO. 24:** Produce any and all documents, including but not limited to emails,
23 letters, memorandum, reports, and meeting minutes related to or mentioning any hosting
24 provider including but not limited to Cloudflare, Inc.

1 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad and unduly
2 burdensome and seeks irrelevant information and/or information not reasonably calculated to
3 lead to the discovery of admissible evidence. Defendant objects to the extent that this request
4 seeks documents protected by any privilege, including, without limitation, the attorney-client
5 privilege or the attorney work product doctrine or some other privilege or confidentiality.
6 Subject to and without waiving these objections, Defendant responds as follows:

7 **RESPONSE:** Defendant will produce responsive documents within its care, custody, or
8 control with respect to the time period of January 2019 – June 2020 with respect to
9 communications to or from United States hosting providers. Defendant refers Plaintiff to
10 documents produced under bates stamps: FSG 000020 – FSG 000026 and FSG 000027 –
11 000034.

12 **REQUEST NO. 25:** Produce any and all documents, including but not limited to emails,
13 letters, memorandum, reports, and meeting minutes related to or mentioning Tiger Media.

14 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad and unduly
15 burdensome and seeks irrelevant information and/or information not reasonably calculated to
16 lead to the discovery of admissible evidence. Defendant objects to the extent that this request
17 seeks documents protected by any privilege, including, without limitation, the attorney-client
18 privilege or the attorney work product doctrine or some other privilege or confidentiality.
19 Subject to and without waiving these objections, Defendant responds as follows:

20 **RESPONSE:** Defendant has no such documents that specifically reference or concern
21 the United States in its care, custody, or control.

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23 **REQUEST NO. 26:** Produce any and all documents, including but not limited to emails,
24 letters, memorandum, reports, and meeting minutes related to or mentioning United States.

1 **OBJECTION:** Defendant objects to this Request to the extent it is overbroad and unduly
2 burdensome and seeks irrelevant information and/or information not reasonably calculated to
3 lead to the discovery of admissible evidence. Defendant objects as it is ambiguous as to what
4 makes a document “relate” to the “United States.” Defendant objects to the extent that this
5 request seeks documents protected by any privilege, including, without limitation, the attorney-
6 client privilege or the attorney work product doctrine or some other privilege or confidentiality.
7 Subject to and without waiving these objections, Defendant responds as follows:

8 **RESPONSE:** Defendant produces documents bates stamped FSG 000054 – FSG
9 000101.

10 **REQUEST NO. 27:** Produce any and all emails or other written correspondence or
11 communication with Kam Keung Fung.

12 **OBJECTION:** Defendant objects to this Request as overbroad and unduly burdensome and
13 seeks irrelevant information and/or information not reasonably calculated to lead to the
14 discovery of admissible evidence. Subject to and without waiving these objections, Defendant
15 responds as follows:

16 **RESPONSE:** Defendant has no such documents that specifically reference or concern
17 the United States in its care, custody, or control.

18
19 **REQUEST NO. 28:** Produce Google Analytics Reports for tracking code UA-88439523; UA-
20 88439523-1; UA-88439523-2; UA-88439523-3; and UA-88439523-4.

21 **OBJECTION:** Defendant objects to this Discovery Request as overbroad and unduly
22 burdensome. Defendant objects to this request to the extent that it could be read to require
23 Defendant to create or produce documents that do not otherwise exist or which are not within the
24 Defendant’s care, custody, or control. Defendant objects to this inquiry to the extent that it could

1 be read to impose an obligation on Defendant to conduct independent research for Plaintiffs'
 2 benefit. Defendant is unable to produce these reports as Google has denied it access to produce
 3 these reports. Subject to, and without waving these objections, Defendant responds as follows:

4 **RESPONSE:** Notwithstanding the foregoing, prior to Google denying Defendant access
 5 to run a report for tracking code UA-88439523-3, Defendant saved two pages from the report for
 6 tracking code UA-88439523-3, these pages are produced as documents bates stamped FSG
 7 000102 – FSG 000103.

8 **REQUEST NO. 29:** Produce AdThis Reports for tracking code AddThisPubID: ra-
 9 58a2e9d645e86f23.

10 **OBJECTION:** Defendant objects to this Discovery Request as overbroad and unduly
 11 burdensome. Defendant objects to this request to the extent that it could be read to require
 12 Defendant to create or produce documents that do not otherwise exist or which are not within the
 13 Defendant's care, custody, or control. Defendant objects to this inquiry to the extent that it could
 14 be read to impose an obligation on Defendant to conduct independent research for Plaintiffs'
 15 benefit. Subject to and without waiving this objection, Defendant responds as follows:

16 **RESPONSE:** Defendant produces documents bates stamped FSG 000040 – FSG
 17 000041.

18 **REQUEST NO. 30:** Produce BlueKai Reports for tracking code BlueKaiSiteID: 27675.

19 **OBJECTION:** Defendant objects to this Discovery Request as overbroad and unduly
 20 burdensome. Defendant objects to this request to the extent that it could be read to require
 21 Defendant to create or produce documents that do not otherwise exist or which are not within the
 22 Defendant's care, custody, or control. Defendant objects to this inquiry to the extent that it could
 23 be read to impose an obligation on Defendant to conduct independent research for Plaintiffs'
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benefit. Defendant objects because Defendant has no relationship with BlueKai. Subject to and without waiving these objections, Defendant responds as follows:

RESPONSE: Defendant has no responsive documents in its care, custody, or control.

REQUEST NO. 31: Produce any and all documents referenced in the Answers to Interrogatories.

RESPONSE: No documents are referred to in the interrogatories and, as such, there are no documents responsive to this request.

INTERROGATORIES

INTERROGATORY NO. 1: Please describe the relationship Fellow Shine Group has with the website pussl48.com.

OBJECTION: Defendant objects on the basis that this interrogatory is overbroad and seeks irrelevant information and/or information not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these objections, Defendant responds as follows:

RESPONSE: Defendant has no relationship with the website pussl48.com.

1 Fellow Shine Group's Answers to Interrogatories are signed under the pains and
2 penalties of perjury this 10th Day of September 2021

3 For and on behalf of
FELLOW SHINE GROUP LIMITED
4 弱耀集團有限公司

Ming Chung

.....
Authorized Signature(s)

5 Name: Ming Chung Wu

6 Title: Director of Fellow Shine Group, Ltd
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As to Objections:

Philip P. Mann, Esq. (WSBA No. 28860)
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107 Spring Street
Seattle, Washington 98104
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/s/ Valentin Gurvits

Valentin D. Gurvits (*pro hac vice*)
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/s/ Evan Fray-Witzer

Evan Fray-Witzer (*pro hac vice*)
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Telephone: 617-426-0000
Facsimile: 617-423-4855
Evan@CFWLegal.com

Attorneys for Defendants

Dated: September 14, 2021

CERTIFICATE OF SERVICE

I hereby certify on the date indicated below I served the foregoing document on all parties who have appeared in this matter via e-mail:

Spencer D. Freeman

sfreeman@freemanlawfirm.org

DATED: September 14, 2021

By: /s/ Evan Fray-Witzer